Adam D. Ford (NYB #4115531)

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Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT, IN AND FOR THE EASTERN DISTRICT OF NEW YORK

SEMYON GRINBLAT, individually and on behalf of others similarly situated,

Plaintiff,

VS.

FUTANI 1959 CORP, BILL WOLF PETROLEUM CORP., JOHN DOES 1-X, LIMITED COMPANIES, PARTNERSHIPS, CORPORATIONS 1-X,

Defendant.

VERIFIED NOTICE OF WITHDRAWAL OF MOTION TO STAY PROCEEDINGS

and

VERIFIED MOTION TO DISMISS WITHOUT PREJUDICE

and

VERIFIED MOTION FOR WITHDRAWAL OF COUNSEL

1:19-CV-7297-DLI-SJB

Judge Diane Gujarati Magistrate Judge Sanket J. Bulsara

Undersigned Counsel has confirmed that Plaintiffs' family has not filed a petition to appoint an executor of the estate since the time the Motion was filed as was anticipated. Plaintiff's family has informed undersigned Counsel that they do not intend to seek the appointment of an executor.

Therefore, without a client or representative to consult, undersigned Counsel requests the Court enter an order as follows:

- 1. The Motion to Stay Proceedings (Doc. 20) dated March 4, 2021 (the "Motion"), be withdrawn;
- 2. That undersigned Counsel's withdrawal be granted by the Court; and,
- 3. The above captioned case be dismissed without prejudice.

DATED the 6th day of May 2021.

FORD & HUFF LC

/s/ Adam D. Ford Adam D. Ford (NYB #4115531) FORD & HUFF LC 228 Park Avenue South New York, New York 10003-1502 Telephone: (212) 518-7007

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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I, the undersigned, certify that on the 6th day of May 2021, I caused a true and correct copy of the foregoing NOTICE OF WITHDRAWAL OF MOTION TO STAY PROCEEDINGS, MOTION TO DISMISS WITHOUT PREJUDICE, and MOTION FOR WITHDRAWAL OF COUNSEL to be filed with the Court electronically via CM/ECF, which caused notice to be served upon all e-filing counsel of record via the Court's Notice of Electronic Filing [NEF].

/s/ Adam D. Ford
